### Exhibit 2

#### **Notice of Motion and Opportunity to Object**

# UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN

	)
In re	) Chapter 9
	)
CITY OF DETROIT, MICHIGAN,	) Case No. 13-53846
	)
Debtor.	) Hon. Steven W. Rhodes
	)

## NOTICE OF MOTION TO COMPEL RESPONSES TO INTERROGATORIES

**PLEASE TAKE NOTICE** that on May 9, 2014, Syncora Guarantee Inc. and Syncora Capital Assurance Inc. ("Syncora") filed the *Motion to Compel Responses to Interrogatories* in the United States Bankruptcy Court for the Eastern District of Michigan (the "Bankruptcy Court") to compel responses to Syncora's First Set of Interrogatories to the City of Detroit [Doc. No. 4036].

PLEASE TAKE FURTHER NOTICE that your rights may be affected by the relief sought in the Motion. You should read these papers carefully and discuss them with your attorney, if you have one. If you do not have an attorney, you may wish to consult one.

**PLEASE TAKE FURTHER NOTICE** that if you do not want the Bankruptcy Court to grant the Objectors' Motion or you want the Bankruptcy Court to consider your views on the Motion, by May 23, 2014<sup>1</sup>, you or your attorney must:

Concurrently herewith, Syncora is seeking expedited consideration and shortened notice of the Motion. If the Court grants such expedited consideration and shortened notice, Syncora will file and serve notice of the new response deadline.

File with the Bankruptcy Court a written response to the Motion, explaining your position, electronically through the Bankruptcy Court's electronic case filing system in accordance with the Local Rules of the Bankruptcy Court or by mailing any objection or response to:<sup>2</sup>

United States Bankruptcy Court Theodore Levin Courthouse 231 West Lafayette Street Detroit, MI 48226

You must also serve a copy of any objection or response upon:

James H.M. Sprayregen, P.C. Ryan Blaine Bennett Stephen C. Hackney KIRKLAND & ELLIS LLP 300 North LaSalle Chicago, Illinois 60654 Telephone: (312) 862-2000 Facsimile: (312) 862-2200

- and -

Stephen M. Gross
David A. Agay
Joshua Gadharf

MCDONALD HOPKINS PLC
39533 Woodward Avenue
Bloomfield Hills, MI 48304
Telephone: (248) 646-5070
Facsimile: (248) 646-5075

If an objection or response is timely filed and served, the clerk will schedule a hearing on the Motion and you will be served with a notice of the date, time and location of the hearing.

PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Motion and may enter an order granting such relief.

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A response must comply with F. R. Civ. P. 8(b), (c) and (e).

#### Dated: May 9, 2014 /s/ Stephen C. Hackney

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